

TECHNICAL NARRATIVE

This Technical Statement and attached exhibits were prepared on behalf of North American Broadcasting Co., Inc. (“North American”), licensee of station WTDA(FM), Channel 280A, Westerville, Ohio. North American herein proposes to amend minor change application BPH-20101004ACN. This amendment proposes to use the same transmitter site as in the previous amendment and to change the WTDA(FM) community of license to Worthington, Ohio. Detailed information about Worthington is included in Section III-B FM Engineering – (18.) Community of License Change - Section 307(b) (Exhibit 35). Since the original WTDA(FM) application and amendments were filed, the Audio Division has issued a *Report and Order* in MB Docket No. 10-118, 26 FCC Rcd 10259 (2011) (Tualatin and Aloha, OR). This decision involved a proposed community of license change between communities located in the same Urbanized Area. This decision clarifies Commission policy on “intra” Urbanized Area community of license changes similar to this WTDA(FM) amendment. This decision held that a *Tuck* analysis is not required for a station changing community of license within the same Urbanized Area and no Priority 3 credit will be awarded for a first local transmission service. This amendment follows Commission policies established with the Tualatin and Aloha decision and thus the 307(b) determination of the benefits of this proposal will be based entirely upon Priority 4 analysis.

Overview

This proposal involves two contingent applications for minor changes. The first minor change application is for a transmitter site change and community of license change for station WTDA(FM). North American proposes to change the community of license of WTDA(FM)

from Westerville, Ohio to Worthington, Ohio. The second minor change application involves WMNI(AM), which is also licensed to North American. North American proposes to change the community of license of WMNI(AM), 920 kHz, from Columbus, Ohio to Westerville, Ohio, contingent upon the implementation of the WTDA(FM) modification to Worthington. No Low Power FM stations (LPFM's) or Class D FM stations are affected by this proposal. The WTDA(FM) and WMNI(AM) minor change applications are being filed as contingent applications. The proposal is described in its entirety for the convenience of the FCC staff but the actual requests are made by each application.

Modification of WTDA(FM), Channel 280A, at Westerville, Ohio

North American seeks to modify the license of WTDA(FM), Channel 280A, Westerville, Ohio, to change the transmitter site. North American also proposes to change the community of license of WTDA(FM) from Westerville, Ohio to Worthington, Ohio. WTDA(FM) would be the first full time service and first FM service at Worthington. Currently, WRFD, 880 KHz (Facility ID #58638), a daytime-only AM station, is licensed to Columbus-Worthington. The hypothetical reference site coordinates for WTDA(FM) at Worthington, Ohio, are 40-08-36 North Latitude, 82-59-00 West Longitude (NAD 27). The coordinates of the proposed application site are 39-57-59.8 North Latitude, 83-06-28.3 West Longitude (NAD 27) and the site is mutually exclusive with the licensed facility of WTDA(FM). This proposed modification is also compliant with all the requirements of 47 CFR §73.207 and 47 CFR §73.315. Compliance with §73.315 includes a Supplemental Showing using Longley-Rice contours demonstrating community grade coverage of Worthington, Ohio. V-Soft Probe 3 software was used to generate the maps and exhibits associated with the supplemental showing. The parameters used to generate the Longley-Rice

contour are shown in a legend on the coverage map. These parameters are consistent with those specified in OET Bulletin 69. An urban clutter loss factor of 6 db was included in the Longley-Rice calculations. The Longley-Rice median occurrence 70 dBu contour covers 100 percent of Worthington. North American is proposing to implement this change at an existing tower site. The Federal Aviation Administration has issued a Determination of No Hazard for the WTDA(FM) frequency at this location. The tower has been registered with the Commission and assigned Antenna Structure Registration Number 1231947. Channel studies indicate there are no other Class A channels available to WTDA(FM) to relocate to the proposed transmitter site. The application site Channel Study for WTDA(FM) shows short-spacing to two stations. The proposed WTDA(FM) application site is short spaced to a construction permit for station WNKE(FM), Channel 281C0, New Boston, Ohio by 9.3 km. and WXEG(FM), Channel 281A, licensed to Beaver Creek, Ohio by 16.84 km. WTDA(FM) proposes to adopt Section 73.215 contour protection with respect to stations WNKE(FM) and WXEG(FM). By operating with an effective radiated power of 6.0 kilowatts at 99.3 meters HAAT, WTDA(FM) will not overlap protected or interfering contours with WNKE. A directional antenna pattern will be utilized to protect WXEG(FM) from contour overlap.

Modification of WMNI(AM), 920 kHz, at Columbus, Ohio

North America proposes to change the community of license of WMNI(AM) (Facility ID #99110) from Columbus, Ohio to Westerville, Ohio, contingent upon implementation of the WTDA(FM) change of community from Westerville to Worthington. No other changes to WMNI(AM) are being proposed. The technical showing included with the WMNI(AM) application demonstrates that WMNI(AM) provides the required community grade coverage to

100 percent of Westerville with both the daytime 5.0 mV/m and night time interference free (NIF) contours. There are currently two full power stations licensed to Westerville. WTDA(FM) and WVMX(FM), Channel 300A (Facility ID #54556). Westerville has a 2010 Census population of 36,120. In the *Rural Radio Order*,¹ it states that the Commission will strongly disfavor an application that removes the second local service from a community of 7,500 persons or greater. FCC staff has indicated that this policy will not apply to “intra” urbanized area community of license changes and that the Urbanized Area service presumption would precede any consideration of whether a local service is being removed from a community, rather than from an Urbanized Area. However, in an abundance of caution, North American is proposing to modify WMNI(AM) to provide a second local service “backfill” to Westerville.

Summary

This proposal creates no white, gray or underserved areas. No individuals would receive fewer than fourteen interference-free services as a result of the grant of this proposal. An interference free service would be made available to an additional area of 30.7 sq. km and an additional 260,486 persons, thereby furthering Priority 4.

¹ *Policies to Promote Rural Radio Service and to Streamline Allotment and Assignment Policies*, 25 FCC Rcd 2556 (2011).